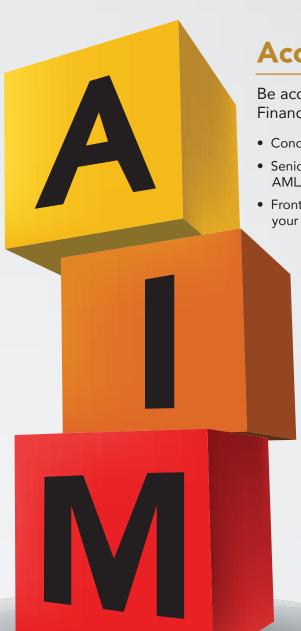
Anti-Money Laundering/ Countering the Financing of Terrorism (AML/CFT) Supervisory Expectations

Regulated dealers must "AIM" for effectiveness of their AML/CFT frameworks, systems and controls



Accountability

Be accountable for the Money Laundering/Terrorism Financing (ML/TF) risks which your business faces

- Conduct the ML/TF risk assessments for your business
- Senior management is accountable for putting and implementing AML/CFT measures in your business based on identified risks
- Frontline staff need to have clear ownership of the ML/TF risks in your business

Investment

Invest in the AML/CFT measures for your business

- Develop AML/CFT internal policies, procedures and controls (IPPC) for your business
- Ensure adequate guidance and training to address the ML/TF risks, including frontline staff

Management

Ensure effective execution to manage the ML/TF risks for your business

- Regularly review and update your ML/TF risk assessments
- Have a strong mechanism to detect and manage suspicious customers and transactions, and to file suspicious transaction reports (STR) and cash transaction reports (CTR)

